

September 17, 2010

Alan I. Leshner
Chief Executive Officer and
Executive Publisher, *Science*

Department of the Interior

Re: *Proposed Scientific Integrity Policy of the Department of the Interior*
Submitted via email: DOI_Science_Integrity@ios.doi.gov

To Whom It May Concern:

Thank you for the opportunity to comment on the Proposed Scientific Integrity Policy of the Department of the Interior (DOI) published in the *Federal Register* on August 31, 2010.

On behalf of the American Association for the Advancement of Science, the world's largest general scientific society, we applaud the Department for recognizing the importance of protecting the integrity of science. By promoting the responsible use of science, the Department is taking a critical step towards strengthening the scientific enterprise and public policy process. In particular, AAAS commends DOI for recognizing the value of scientific peer review and the importance of openness in research.

Though the draft policy provides clarity on research processes, AAAS is concerned that it lacks detail on how scientific information is communicated and used in the policy process. In his March 19, 2009 memo on scientific integrity, President Obama clearly noted, "Political officials should not suppress or alter scientific or technological findings or conclusions." Yet the DOI draft policy contains no mention of this aspect of scientific integrity. Furthermore, it is also of concern that the policy only applies to employees, contractors and volunteers "who engage in scientific activities." It appears that the policy does not apply to public officials who use the scientific information. Indeed, editing of documents to aid decision making is exempted from its scope.

We respectfully suggest that language be added to all relevant sections of the proposed policy to ensure that all employees at the Department work to protect scientific integrity. A model that could be emulated is the policy of the U.S. Geological Survey, one of the Department's own agencies, which currently covers all employees in the scope of its scientific integrity policy.

Similarly, Section 3.6 calls for each bureau to establish "procedures to ensure adherence to the requirements of this chapter." DOI should make clear how much variation in procedures will be allowed across bureaus and offices, and according to what criteria such variations should be based. In a policy focused on integrity, it is critical that employees are, and perceive to be, treated fairly, irrespective of where they are based within the Department.

We also believe that the Department has missed an opportunity to describe how employees who report violations will be protected from potential retaliation, and to make clear to all employees that retaliation in response to employee efforts to protect the integrity of science is unacceptable and will be subject to review and possible discipline.

In addition, we have concerns about the possibility of misconduct charges coming from the "public release of a scientific product without the required level of review or without the inclusion of appropriate disclaimers." (Appendix F (4)) We understand the need for the appropriate level of review by department officials. However, this provision is troubling because it could be interpreted and used to intimidate employees into agreeing to "disclaimers" that could inappropriately weaken the findings and conclusions. It might also suppress reasonable differences of opinion about the nature of any disclaimers; legitimate differences of opinion about the relevant science should not be interpreted as "misconduct."

AAAS stands ready to assist in this important endeavor of protecting scientific integrity across the entire Department of the Interior.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan Leshner", with a long horizontal flourish extending to the right.

Alan I. Leshner